IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA NORFOLK DIVISION

ACTIVEVIDEO NETWORKS, INC. Plaintiff/Counterclaim-Defendant,

v.

VERIZON COMMUNICATIONS INC., VERIZON SERVICES CORP., VERIZON VIRGINIA INC. AND VERIZON SOUTH INC. Defendants/Counterclaim-Plaintiffs.

Civil Action No. 2:10-cv-248 RAJ/DEM

## PLAINTIFF'S MOTION FOR A PERMANENT INJUNCTION

For the reasons set forth in the accompanying memorandum, Plaintiff ActiveVideo Networks, Inc. ("ActiveVideo") respectfully moves this Court for a Permanent Injunction ordering Defendants Verizon Communications Inc., Verizon Services Corp., Verizon Virginia Inc., and Verizon South Inc. (collectively, "Verizon") to cease and desist from further infringement of ActiveVideo's patents.

Dated: August 12, 2011 Respectfully submitted,

/s/ Stephen E. Noona

Stephen E. Noona

(Virginia State Bar No. 25367)

KAUFMAN & CANOLES, P.C.

150 W. Main Street, Suite 2100

Norfolk, VA 23510

Telephone: (757) 624-3000

Facsimile: (757) 624-3169

senoona@kaufcan.com

Nathan W. McCutcheon

(Virginia State Bar No. 36308)

David M. Morris

(Virginia State Bar No. 30146)

## MORGAN, LEWIS & BOCKIUS LLP

1111 Pennsylvania Avenue, NW

Washington, DC 20004

Telephone: (202) 739-3000 Facsimile: (202) 739-3001

nmccutcheon@morganlewis.com dmorris@morganlewis.com

Daniel Johnson, Jr. Michael J. Lyons

Dion M. Bregman

Ahren C. Hoffman

## MORGAN, LEWIS & BOCKIUS, LLP

2 Palo Alto Square

3000 El Camino Real, Suite 700

Palo Alto, CA 94306-2122

Telephone: (650) 843-4000

Facsimile: (650) 843-4001

djjohnson@morganlewis.com

mlyons@morganlewis.com

dbregman@morganlewis.com ahoffman@morganlewis.com

Counsel for Plaintiff

## **CERTIFICATE OF SERVICE**

I herby certify that on August 12, 2011, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Gregory N. Stillman (Virginia State Bar No. 14308) Brent L. VanNorman (Virginia State Bar No. 45956) HUNTON & WILLIAMS, LLP 500 E. Main Street, Suite 1000 Norfolk, VA 23514 Telephone: (757) 640-5314 Facsimile: (757) 625-7720 gstillman@hunton.com bvannorman@hunton.com

(Virginia State Bar No. 39581)
Bradley T. Lennie
Justin T. Arbes
HUNTON & WILLIAMS, LLP
1900 K Street, NW
Washington, DC 20006
Telephone: (202) 955-1500
Facsimile: (202) 778-2201
bburoker@hunton.com
blennie@hunton.com
jarbes@hunton.com

Brian M. Buroker

Henry B. Gutman Lisa H. Rubin SIMPSON THACHER & BARTLETT LLP 425 Lexington Avenue

New York, New York 10017 Phone: (212) 455-2000 Fax: (212) 455-2502 hgutman@stblaw.com lrubin@stblaw.com

Counsel for Defendants

/s/ Stephen E. Noona

Stephen E. Noona (Virginia State Bar No. 25367) KAUFMAN & CANOLES, P.C. 150 W. Main Street, Suite 2100 Norfolk, VA 23510

Telephone: (757) 624-3000 Facsimile: (757) 624-3169 senoona@kaufcan.com

11239242\_1.DOC